

PL Sum. J.

Ex. 026



Transcript of Gregory E. Stocker 30(b)(6)

Wednesday, May 11, 2022

W.K. v. Red Roof Inns, Inc

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Reference Number: 116588

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 W.K., E.H., M.M., R.P., :
5 M.B., D.P., A.F., C.A., :
6 R.K., AND K.P., :

7 Plaintiffs, :

8 vs. :

Case No.

1:20-CV-05263-MHC

9 RED ROOF INNS, INC.; :
10 FMW RRI NC, LLC; RED ROOF :
11 FRANCHISING, LLC; RRI WEST :
12 MANAGEMENT, LLC; VARAHI :
13 HOTEL, LLC; WESTMONT :
14 HOSPITALITY GROUP, INC.; :
15 AND RRI III, LLC, :
16 :

17 Defendants. :

18 - - -
19 VIDEOTAPED 30(b)(6) DEPOSITION OF GREGORY E. STOCKER
20 - - -

21 - - -
22 May 11, 2022
23 1:01 p.m.
24 BAILEY CAVALIERI
25 10 West Broad Street
 Suite 2100
 Columbus, OH 43215
 - - -

26 Reported by: Tracy J. Schell
27 - - -

1 APPEARANCES

2 ON BEHALF OF THE PLAINTIFFS:

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16 ON BEHALF OF THE DEFENDANTS RED ROOF INNS, INC.; FMW
17 RRI NC, LLC; RED ROOF FRANCHISING, LLC; RRI WEST
MANAGEMENT, LLC; WESTMONT HOSPITALITY GROUP, INC., AND
RRI III, LLC:

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1 APPEARANCES (CONTINUED)

2 ON BEHALF OF THE DEFENDANT VARAHI HOTEL, LLC:

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10 ALSO PRESENT:

11 Bruce Sandy, Videographer
12 Christian Novay, Esq.

13 - - -

1 Red Roof's knowledge on topic 8 for -- beginning in
2 2008; is that correct?

3 MR. ALLUSHI: Objection.

4 A. Correct.

5 Q. How long was this December 2010 manual in
6 effect after December 2010?

7 A. I believe it was in effect --

8 MR. ALLUSHI: I'm going to object to that.
9 Outside the scope of the topics.

10 Q. You can answer.

11 A. I believe it was -- it's -- it was in effect
12 until -- until we became a hundred percent franchised
13 organization.

14 Q. And when was that?

15 A. I can't give the specific date, but it was in
16 the last year and a half, two years.

17 Q. Another red flag for prostitution is signs of
18 physical abuse, correct?

19 A. Correct.

20 Q. And when did --

21 A. Could be.

22 Q. And when did Red Roof first become aware that
23 that was a red flag of prostitution?

24 A. I don't know.

25 Q. Another red flag for prostitution are

1 scantily clad individuals, correct?

2 A. Could be, correct.

3 Q. And when did Red Roof first became aware that
4 that was a red flag for prostitution?

5 A. I don't know.

6 Q. Another red flag for prostitution is a guest
7 requesting a secluded room, correct?

8 A. Could be, correct.

9 Q. And when did Red Roof first become aware that
10 that was a red flag for prostitution?

11 A. I don't know.

12 Q. Did Red Roof know in 2010 that that was a red
13 flag for prostitution?

14 A. Yes.

15 Q. Did they know in 2008?

16 A. I don't know.

17 Q. Did they know in 2009?

18 A. I don't know.

19 Q. Red Roof knows that another red flag for
20 prostitution is a refusal of housekeeping services,
21 correct?

22 A. Could be one of, yes.

23 Q. And when did Red Roof first become aware of
24 that red flag of prostitution?

25 MR. ALLUSHI: Objection.

1 A. I don't know.

2 Q. Red Roof knows that a red flag for sex
3 trafficking is multiple individuals going in and out of
4 a room for a short period of time, correct?

5 A. Could you repeat that question --

6 Q. Sure.

7 A. -- please?

8 Q. Red Roof knows that a red flag for sex
9 trafficking is multiple individuals going in and out of
10 a room for short periods of time?

11 A. Could be one of the red flags.

12 Q. And when did Red Roof first learn that that
13 was a red flag for sex trafficking?

14 A. I don't know specifically.

15 Q. Did they know that in 2010?

16 A. Yes.

17 Q. And Red Roof knows that signs of physical
18 abuse are a red flag for sex trafficking, correct?

19 A. Yes.

20 Q. And when did it first learn that?

21 A. I don't know.

22 Q. Did it know that in 2010?

23 A. Yes.

24 Q. Did it know that in 2009?

25 A. I don't know.

1 Q. Red Roof knows that scantily clad individuals
2 is a red flag for sex trafficking, correct?

3 A. It could be.

4 Q. And when did Red Roof first know that?

5 A. I don't know.

6 Q. Did it know in 2010?

7 A. Yes.

8 Q. Red Roof knows that the presence of a large
9 number of condoms is a red flag of potential sex
10 trafficking, correct?

11 A. Could be.

12 Q. And when did Red Roof first learn that?

13 A. I don't know.

14 Q. Did they know in 2010?

15 A. Yes.

16 MR. ALLUSHI: Objection.

17 THE WITNESS: May I take a break, please?

18 MR. VARGHESE: That's fine.

19 MR. NOVAY: Is there a question pending?

20 THE VIDEOGRAPHER: The time is 1:51 p.m.

21 We're going off the record.

22 (Recess taken.)

23 THE VIDEOGRAPHER: The time is 1:57 p.m.

24 We're back on the record.

25 BY MR. VARGHESE:

1 So for you to state to the witness that he's
2 not prepared is a inappropriate, I think, question.

3 BY MR. VARGHESE:

4 Q. Mr. Stocker, as the corporate representative
5 for these Red Roof entities, the only location you can
6 identify that was subject to a nuisance or abatement
7 action is the Smyrna, Georgia, location, correct?

8 A. As of 6:03 right now without documentation in
9 front of me to validate the actual location, yes,
10 that's my testimony.

11 Q. Are you aware of a nuisance or abatement
12 action related to any properties in Gwinnett County,
13 Georgia?

14 A. Yes, I am.

15 Q. And which property was that?

16 A. Actually, there were several. Again, not
17 all-inclusive, I don't have them memorized off the top
18 of my head, but I can tell you one of them was
19 Norcross, property 166.

20 Q. Any others?

21 A. I believe Suwanee, possibly, Georgia. There
22 was a Hometown Studio -- Studios. I don't recall the
23 specific location, but it was in Atlanta.

24 And just for the record, these were all in
25 attendance for one meeting at the same time.

1 two different communications. You know, the original
2 one in 2017, primarily what their main focus was and
3 reason for the notice versus the one in -- later on in
4 the year in 2017. It's hard to compare apples to
5 apples. One could have been different from the next.

6 So to answer your question, it's -- it's
7 difficult to determine if it didn't get better.

8 Q. Cobb County Police continued to have concerns
9 about this property in August of 2017, correct?

10 A. It appears from this communication, yes.

11 Q. And we've previously used this document, and
12 it's 179, so I'm going to change that on the face of
13 the document if you don't mind.

14 A. Whoops. Sorry.

15 MR. ALLUSHI: What was the previous number?

16 MS. SEALS: 179.

17 BY MR. VARGHESE:

18 Q. And this email from Major Adcock attaches
19 several documents to this email, correct?

20 A. Yes.

21 Q. And the email refers to a 12:30 conference
22 call, correct?

23 A. Yes.

24 Q. And did you participate in a conference call
25 related to this property with Major Adcock?

1 CERTIFICATE

2 STATE OF OHIO:

3 SS:

4 COUNTY OF DELAWARE:

5 I, Tracy J. Schell, a Notary Public in and
6 for the State of Ohio, duly commissioned and qualified,
7 do hereby certify that the within-named GREGORY E.
8 STOCKER was first duly sworn to testify to the truth,
9 the whole truth, and nothing but the truth in the cause
aforesaid; that the testimony then given was reduced to
stenotypy in the presence of said witness, afterwards
transcribed; that the foregoing is a true and correct
transcript of the testimony; that this deposition was
taken at the time and place in the foregoing caption
specified.

10 I do further certify that I am not a
11 relative, employee or attorney of any of the parties
12 hereto; that I am not a relative or employee of any
13 attorney or counsel employed by the parties hereto;
14 that I am not financially interested in the action; and
further, I am not, nor is the court reporting firm with
which I am affiliated, under contract as defined in
Civil Rule 28(D).

15 In witness whereof, I have hereunto set my
16 hand and affixed my seal of office at Lewis Center,
17 Ohio, on this 19th day of May, 2022.

18
19
20 

21 Tracy J. Schell
22 Notary Public, State of Ohio.

23 My commission expires: November 5, 2023
24
25